

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

STATE OF MARYLAND
Plaintiff,

v.

NORRIS BERNARD ELLIS
Defendant.

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Case No.: C-10-CR-21-000535

Next Court Date: 11/14/2022
Pre-trial

JOINT/UNOPPOSED MOTION TO REMOVE CURRENT PRE-TRIAL HEARING

COMES NOW DEFENDANT, Norris B. Ellis, by and through undersigned counsel, Benjamin M. Kurtz, and the law offices of Kurtz, Peters & Associates, with consent of the Frederick County State's Attorney, and hereby requests the current hearing scheduled be removed from the docket and a new date be set in due course for the reasons averred:

1. That current counsel for the Defendant was retained by the Defendant and a notice of appearance was filed on October 25th, 2022.
2. That prior to retaining current counsel previous counsel had filed a line to strike her appearance, and to postpone the previous scheduled trial date of November 28th through December 2nd, 2022; both motions were granted by this Court.
3. That the currently scheduled pre-trial hearing is now premature as new Defense counsel has not yet received discovery and new trial dates will need to be scheduled with the State and assignment office.
4. That counsel for Defendant will be out of the country from 11/8/22 through 11/15/22 and will not be able to attend the hearing on the 14th.
5. Counsel for the Defendant corresponded with Ms. Tammy Leache and it was requested that Defense counsel file this joint request today before leaving the country tomorrow morning.

For the aforementioned reasons, both parties request this honorable Court remove the scheduled pre-trial hearing on November 14th, 2022, and it be set in by assignment after clearing new trial dates with both parties.

Respectfully submitted,
Kurtz, Peters & Associates

By: /s/ Benjamin Kurtz
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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that, on this 7th day of November 2022, a copy of the foregoing
Consent/Unopposed Motion to remove Pre-trial Hearing was served via MDEC on all parties.

/s/ Benjamin Kurtz
Benjamin M. Kurtz, Esquire